

# EXHIBIT

## 20

**From:** Bob Nance  
**Sent:** Friday, May 26, 2006 3:13 PM  
**To:** 'robert.george@kutakrock.com'; Richard Garren  
**Subject:** Interrogatory count

**Attachments:** Interrogatory count re Tyson 052006.pdf

Robert, following our conversation earlier this afternoon, Rick Garren provided me the attached count of interrogatories. It shows how we counted the subparts. Please look it over and give me a call about any parts you are willing to withdraw under an agreement as proposed in my letter to you yesterday. Thanks.



Interrogatory count  
re Tyson 0...

Robert A. Nance  
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**From:** George, Robert W. [Robert.George@KutakRock.com]  
**Sent:** Friday, June 02, 2006 9:49 AM  
**To:** Bob Nance; Kelly\_Burch@oag.state.ok.us; Trevor\_Hammons@oag.state.ok.us;  
Richard Garren  
**Cc:** Jay Jorgensen; Webster, Timothy K.; Burns, Bryan; sjantzen@ryanwhaley.com;  
Patrick Ryan; Hopson, Mark D.  
**Subject:** RE:  
Bob,

You have accurately stated our agreement. I look forward to receiving the State's discovery responses. After reviewing those responses, I will determine whether a motion to compel responses to Tyson Poultry, Inc., Interrogatory No. 2, Tyson Foods, Inc., Interrogatories 2 and 9, and Cobb-Vantress Inc. Interrogatory 10 is necessary. I will, of course, confer with you in one final attempt to resolve the State's objections to these and other discovery requests before filing such a motion.

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**From:** Bob Nance [mailto:rnance@riggsabney.com]  
**Sent:** Wednesday, May 31, 2006 4:40 PM  
**To:** George, Robert W.; Kelly\_Burch@oag.state.ok.us; Trevor\_Hammons@oag.state.ok.us;  
Richard Garren  
**Subject:**

Robert, this is to confirm our agreement today regarding interrogatories you have submitted to the State on behalf of your clients Tyson Poultry, Inc., Tyson Foods, Inc., Cobb-Vantress, Inc. and Tyson Chicken, Inc. The State contends that you have submitted more than 25 interrogatories or discrete subparts for each of these clients except Tyson Chicken, Inc. You disagree with our count of the interrogatories and subparts. We have conferred in good faith and arrived at an agreement which preserves all of our respective positions on the interrogatory count issue. On behalf of your clients, you will not withdraw any of the interrogatories or subparts. However, you designated Tyson Poultry, Inc., Interrogatory No. 2, Tyson Foods, Inc., Interrogatories 2 and 9, and Cobb-Vantress Inc. Interrogatory 10 as interrogatories which, if not posed, would, by the State's count (to which you retain your disagreement), reduce the total number of interrogatories and discrete subparts to 25 for each of these three Defendants. The State will present its objections and responses to all interrogatories except the four designated interrogatories. The State will not presently answer the four designated interrogatories, but will present its objections to these designated interrogatories, including the objection that they exceed the limit of 25 interrogatories and discrete subparts. By doing so, you agree that the State has not waived its objection to the number of interrogatories and discrete subparts posed by responding to the others. If you wish to pursue responses to these designated interrogatories, you will move to compel and the State will respond, and retains the right to argue that it has already provided more than the Rules require.

Additionally, you agreed to allow the State an additional week to present its responses and objections to all the interrogatories posed by your clients. These responses and objections will be due on June 8, 2006. By agreeing to this enlargement of time you are not waiving any claim or objection you may wish to present upon receipt of our responses and objections.

Please respond by email to confirm this is our agreement.

Robert A. Nance  
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